

EXHIBIT E

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

LEHMAN BROTHERS HOLDINGS, INC., et al.

Debtors.

Chapter 11

Case No. 08-13555 (JMP)

(Jointly Administered)

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CYNTHIA SWABSIN and ALEXANDER
LEYTMAN, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

LEHMAN BROTHERS HOLDINGS, INC.,

Defendant.

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NOTICE OF CLASS ACTION

PLEASE READ THIS NOTICE CAREFULLY AS IT MAY AFFECT YOUR RIGHTS.

TO: Former employees who were terminated without cause in connection with Debtors' bankruptcy filing in September 2008 and who signed separation agreements with Debtors wherein Debtors promised to pay them their salaries during a 60-day notice period following their termination of employment.

SUBJECT: The claims of former employees of Debtors to recover the full amounts due under the separation agreements that they signed with Debtors in September 2008.

DATE: _____, 2011

The Class Claim

The Plaintiffs are former employees of Debtors who signed separation agreement with Debtors in September 2008, where Debtors promised to pay them salary and benefits through a 60-day notice period and subsequent separation date but who Debtors ceased paying on or around October 3, 2008. Plaintiffs have brought this action on behalf of themselves and all other similarly situated former employees.

The Definition of the Class

The Court has recently certified this case as a Class Action and defined the Class as: Former employees of Debtors who entered into agreements on or about September 9, 2008, to be paid salary and benefits through a 60-day notice period and subsequent separation date but who Debtors ceased paying on or around October 3, 2008, and who have not filed a timely request to opt-out of the class.

Class Counsel and the Class Representative

The Plaintiffs who initiated this lawsuit are represented by Outten & Golden LLP, 3 Park Avenue, 29th Floor, New York, New York 10016, (212) 245-1000. The Court has also recently appointed Plaintiffs Cynthia Swabsin and Alexander Leytman as the Class Representatives.

What to Do

If you wish to be a member of the class, you do not need to do anything and you will receive whatever benefits you, as a Class Member, may be entitled to receive. If you do nothing, you will automatically be a Class Member and be bound by any judgment (whether favorable or unfavorable) or court-approved settlement in the case. Before court approval, you, as a Class Member, will receive notice of any proposed settlement and will be afforded an opportunity to object to the settlement. You may appear by your own counsel, if you are a Class Member.

If you do NOT wish to participate in this Action, and wish to be EXCLUDED and, thereby, reserve your rights under the WARN Act and NOT share in any recovery in the Action, check the box in the form below, and sign and mail that form by certified mail, return receipt requested, to Outten & Golden LLP, 3 Park Avenue, 29th Floor, New York, New York 10016, Attn: René S. Roupinian. The form must be received by Ms. Roupinian no later than _____, 2011. All requests for exclusion received after that date will not be effective, and any person who sends a late request will be a member of the class in the Action and will be bound in the same way and to the same extent as all other Class Members.

The Court has taken no position regarding the merits of Plaintiffs' claim. Please do not call or contact the Court for such information.

If you wish more information or assistance, please contact Jenny Hoxha of Outten & Golden LLP at (212) 245-1000.

EXCLUSION FORM

Swabsin, et al. v. Lehman Brothers Holdings, Inc., et al.
United States Bankruptcy Court for the Southern District of New York
Case No. 08-13555 (JMP)

I, the undersigned, have read the foregoing Notice and understand its contents. I, the undersigned, **do not** want to participate in the Class Action or receive any benefits from the Class Action and do not wish to be bound by the outcome of the Class Action.

NAME (Print)

SIGNATURE

PHONE NO.

ADDRESS

DATE

Send completed form to:
Outten & Golden LLP
3 Park Avenue, 29th Floor
New York, New York 10016

Attn: René S. Roupinian